

Defendant Exhibit B

[Messenger Deposition]

In re Twitter Inc. Securities Litigation

Videotaped Deposition of

ADAM MESSINGER

February 13, 2019

*****ATTORNEYS' EYES ONLY*****

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Adam Messinger

Attorneys' Eyes Only
In re Twitter Inc. Securities Litigation

1 Plaintiffs' Exhibit 222 is not a true and accurate
2 copy of the e-mail that you received on or about
3 May 25th, 2015?

4 MS. GOODHART: Objection. Lacks
5 foundation.

6 THE WITNESS: Again assuming I received it,
7 I have no reason to believe this is not a legitimate
8 e-mail.

9 BY MR. DROSMAN:

10 Q. Okay. Do you see at the top it says, "Hi,
11 OpComm"? Correct?

12 A. It does, yes.

13 Q. And we established that Leslie Carroll is
14 Mr. Costolo's executive assistant, right?

15 A. Yes.

16 Q. And she writes, "Hope everyone enjoyed
17 their long holiday weekends. Confirmed agendas for
18 tomorrow Tue 5/26 and next week Mon 6/1 are below."
19 Do you see that?

20 A. Yes.

21 Q. "Please let me know if you have any
22 questions." And then she has agendas for May 26,
23 2015, correct?

24 A. Yes.

25 Q. And June 1, 2015, right?

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1 A. Yes.

2 Q. And there's certain items that are in
3 common on those particular two agendas, correct?

4 MS. GOODHART: Objection. The document
5 speaks for itself.

6 THE WITNESS: Would you like me to read
7 the --

8 BY MR. DROSMAN:

9 Q. No. I'm just asking you a question.
10 There's certain agenda items that are in common
11 between the two meetings, correct?

12 A. Yes.

13 Q. "Updates," which is Roman numeral number I,
14 is -- is appears in both meetings, correct?

15 A. Yes.

16 Q. And "metrics" which is Roman numeral number
17 II, appears in both meetings, correct?

18 A. Yes.

19 Q. Okay. And the parens after that says
20 "all," you see that?

21 A. All, yes.

22 Q. What does that refer to?

23 MS. GOODHART: Objection. Lacks
24 foundation.

25 THE WITNESS: I don't know.

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1 CERTIFICATE OF REPORTER

2 I, JOHNNA PIPER, a Certified Shorthand
3 Reporter, hereby certify that the witness in the
4 foregoing deposition was by me duly sworn to tell
5 the truth, the whole truth, and nothing but the
6 truth in the within-entitled cause;

7 That said deposition was taken in shorthand
8 by me, a disinterested person, at the time and place
9 therein stated, and that the testimony of the said
10 witness was thereafter reduced to typewriting, by
11 computer, under my direction and supervision;

12 That before completion of the deposition,
13 review of the transcript [X] was [] was not
14 requested. If requested, any changes made by the
15 deponent (and provided to the reporter) during the
16 period allowed are appended hereto.

17 I further certify that I am not of counsel
18 or attorney for either or any of the parties to the
19 said deposition, nor in any way interested in the
20 event of this cause, and that I am not related to
21 any of the parties thereto.

22 DATED: FEBRUARY 18TH, 2019



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24
25 JOHNNA PIPER, CSR NO. 11268